

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

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|-------------------|---|--------------------------|
| In Re: |) | Case Number: 22-08017 |
| Jose E Soto |) | |
| Marvella Enriquez |) | Chapter: 13 |
| |) | Honorable Jacqueline Cox |
| |) | |
| Debtor(s) |) | |

**AGREED ORDER RESOLVING CREDITOR AMERIHOME MORTGAGE COMPANY,
LLC 'S MOTION FOR RELIEF FROM STAY FOR PROPERTY LOCATED AT 7006 W
64TH PL, CHICAGO, IL 60638 (DOCKET # 41)**

This matter coming to be heard on the Motion for Relief from Stay (Dkt. #41) which was filed in this court by AmeriHome Mortgage Company, LLC ("Creditor"), by and through its mortgage servicing agent ServiceMac, Creditor and Jose E Soto and Marvella Enriquez (collectively, "Debtor"), by and through their attorneys have agreed to a course of action which will condition the continuation of the automatic stay upon certain provisions incorporated herein for the protection of Creditor;

Debtor failed to make regular monthly mortgage payments to Creditor resulting in the motion being filed. Since filing the motion, Debtor cured the post-petition delinquency on payments leaving attorney fees and costs of \$1,549.00 for the motion.

IT IS HEREBY ORDERED:

1. In order to eliminate said post-petition delinquency, Creditor must receive the following payments by the corresponding dates:
 - a. \$1,549.00 on or before January 1, 2026.
2. That Creditor must receive the payments listed in Paragraph #1 on or before the corresponding date. If Creditor fails to receive any one scheduled payment, the repayment schedule is void and if the Debtor fails to bring the loan post-petition current within fourteen (14) calendar days after mailing notification to the Debtor and their attorney, the stay shall be automatically terminated as to Creditor, its principals, agents, successors and/or assigns as to the subject property, upon filing a Notice of Termination of Stay with the clerk of the court.
3. Debtor must continue to make timely post-petition mortgage payments directly to Creditor beginning January 1, 2026.
4. If Debtor fails to pay two (2) future monthly mortgage payment on or before the date on which it is due and if the Debtor fails to bring the loan post-petition current within fourteen (14) calendar days after Creditor mailed notification to the Debtor and their attorney, the stay shall be automatically terminated as to Creditor, its principals, agents, successors and/or assigns as to the subject property, upon filing a Notice of Termination of Stay with the clerk of the court.

5. If Creditor has to send a Notice of Default, the Debtor shall pay attorney fees, in addition to whatever funds are needed to cure the default prior to the expiration of the allowed cure period.

6. If this bankruptcy proceeding is converted to Chapter 7, dismissed or discharged, this Order shall be terminated and have no further force or effect.

/s/Todd J Ruchman
Attorney for Creditor

/s/Michelle E Mandroiu
Attorney for Debtor

Enter:



United States Bankruptcy Judge

Dated: 1/5/26

Prepared by:

Todd J. Ruchman (6271827)
MDK Legal
P.O. Box 165028
Columbus OH 43216-5028
614-220-5611; Fax: 614-627-8181
Attorney for Creditor